UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC.,	)	
Plaintiff,	)	
v.	)	Civil Action No. 78-0107
DIRECTOR, FEDERAL BUREAU OF INVESTIGATION, et al.,	)	
Defendants.	)	

DECLARATION OF L. FLETCHER PROUTY

I, L. FLETCHER PROUTY, declare and state as follows:

1. My name is L. Fletcher Prouty, Colonel, U.S. Air Force (Ret'd). I live at 4201 Peachtree Place, Alexandria, VA 22304.

2. This declaration describes my opinion, based on my experience and analysis, that the Church of Scientology is and has been the target of an undercover network comprising various U.S. Government departments and agencies that is reminiscent of the outlawed Central Intelligence Agency Special Operations Group (CHAOS) and the Federal Bureau of Investigation Counterintelligence (COINTELPRO) programs of the Sixties and Seventies.

3. I have been involved in, and have been responsible for, undercover activities of this kind in my capacity as Chief of the Special Operations section within the office of the Joint Chiefs of Staff (1962-1963); as Senior Air Force officer in the Office of Special Operations within the Office of the Secretary of Defense

Plaintiffs Exhibit 2

(1960-1961); and in a similar capacity as Chief of Team "B" in the Headquarters of the U.S. Air Force (1955-1960). As a regular function of these duties during the above cited nine years in the Pentagon, I was directed to provide military support to the Central Intelligence Agency (CIA) on a regular and frequent basis and these duties required frequent liaison with other departments and agencies of the U.S. Government. My experience in this type of operation dates back to my duties at the Cairo and Teheran Conferences of October/November 1943 when Roosevelt, Churchill, Chiang Kai Shek and Stalin addressed the problems of the war and approved certain important wartime undercover activities. I am the author of "The Secret Team", Prentice Hall (1973) and Ballantine Books (Paperback) (1974), which concerns the intelligence community.

4. In preparation for my opinion, offered below, I have had an opportunity to examine two Video-tapes which were admitted into evidence in Julie Christofferson-Titchbourne v. Church of Scientology of California, et al., Case No. A 7704-05184, depicting clandestine meetings between a self-styled "Federal witness," Gerald D. Armstrong, and a man he calls "Joey" that took place on a "Safe" park bench in Los Angeles on November 7 and November 9, 1984. I have also read the verbatim transcript of both of these meetings as well as numerous affidavits and declarations executed by Mr. Armstrong.

5. During these Video-taped meetings this "Federal witness", Armstrong, outlined a bizarre, multi-agency plot designed to covertly take over the control, property and other assets of the Church of

Scientology. To accomplish these goals, Armstrong has been trained and rehearsed by his lawyer, Michael Flynn of Boston, and by several contact operatives in various government departments and agencies.

6. This is no casual relationship with this legal network. I have read no less than 19 affidavits and declarations made by Armstrong during the period of April 1982 to the present. These were made by Armstrong in no less than six states as widely separated as California, Massachusetts, Florida and Oregon, as well as Canada and London. Although these cases appear to be separate entities, there is usually a central theme against the Church of Scientology and the testimony of Armstrong is generally focused on the same subject matter that his mentors require of him.

7. I find it significant to note that information pertinent to a case being tried in Washington, D.C. in the present time frame is, to a considerable extent, related to vital information Armstrong was attempting to glean from his contact "Joey" during his "safe" park bench clandestine meetings. As I get into this subject matter further, I shall elaborate on the subject of this networking relationship that is the underlying element of any conspiracy.

8. Armstrong begins by trying to impress "Joey", whom he expects to recruit as a "mole", with his importance and his knowledge of the entire nationwide operation. He readily reveals that he has the knowing support of such government officials as:

Al Lipkin, Criminal Investigation Division, Special Agent in the Los Angeles offices of the Internal Revenue Service;

Brackett Denniston, Assistant U.S. Attorney in Boston;

Al Ristuccia, Criminal Investigation Division, Special Agent in the Internal Revenue Service, Los Angeles;

Thomas Doughty, Special U.S. Attorney, in the Federal Bureau of Investigation (FBI);

Richard Greenberg, Attorney, Civil Division of the U.S. Department of Justice (DOJ), Washington, D.C.

9. Armstrong's objective during these first meetings with "Joey" was to follow the game plans of his lawyer, Michael Flynn, and the plans of these federal agents. He reports, "This is Mike's perspective... This is how Mike sees the legal battle is going... His feeling is that a couple, handful of right people, with affidavits can end it. Just end the whole damn thing."

10. Then, as he sees their infiltration tactics succeeding, he adds, "The US authorities will serve these people, and pick them up." This refers to "29 people [of the Church] they're going to indict", referring to then anticipated indictments in Canada.

11. As he whets "Joey's" interest with their plan he begins to fill in the details of how this undercover operation will work. He tells "Joey", "Now Issues [the name for certain Church materials], I want to know number one, how they're run off, what the type face is like... We can simply create these; you know. I can create documents with relative ease."

12. As "Joey" draws him out on the sources of this undercover plan, Armstrong responds, "OK, well, the agencies have asked for some

specific things, that's all they've asked for."

13. Apparently Armstrong, with his revelation "the agencies have asked for...", is not only requesting this inside proprietory Church data for his own use. Instead, he is laying down this request, right from the start of their relationship, for his agency, i.e. FBI, among others, accomplices in Washington, D.C. and in Los Angeles to respond to their own immediate requests to him. Armstrong is wearing to hats; one as fellow conspirator with "Joey" and the other as an informant for the federal government.

14. The "Joey" inquires further with, "Now, who wanted this?" Armstrong replies, "CID...Now, do you want a number in CID?" "Joey" responds, "Yeah." At this point Armstrong reveals who his IRS-CID operative is, "Your people should call, any problems, just call this guy... He wants to talk. You know... Al Lipkin, 213-688-4260. At night 688-4151." As cited above, Lipkin is a Special Agent in Los Angeles and apparently one of the men closest to this "agent provocateur" Armstrong.

15. After more discussion, during which time he keeps flipping the pages of a big notebook, Armstrong refers to key items of the plans that he is supposed to tell "Joey". He wants "Joey" and his supposed accomplices to probe into the basics for the take-over. "Where's the money?" he asks "Joey". "Do you guys know where?" At another point he drives home the main theme. He tells "Joey", "You know there's three things, right? There's personnel, and comm. lines and money." Armstrong knows what is important. He has obviously

been well trained.

16. Later, "Joey" comes right out and says, "What's the purpose of all this?" Armstrong comes back with, "You know, we need this flow of data going back and forth. It has to happen. I think the Feds are going to be real pleased with the fact it is happening and I think they'll reciprocate." Twice he tells "Joey" that he expects a "Global Settlement". He has been led to expect big things. Armstrong dreams of the takeover of power and of big money with his "Global Settlement".

17. It is my assessment that "Global Settlement" refers to the many civil cases against the Church in which Armstrong and his attorney Flynn are involved. In his affidavit he tells of millions of dollars at stake and of the control of the Church. To him "Global Settlement" means a share in a piece of the Universe...to use his own words.

"Joey" warms up to the idea, "Great, great. So, what agencies know about us...?"

Armstrong gets out his list, "Justice Department, FBI..." "Joey" picks that up quickly, "Like who in Justice?". Armstrong replies, "Uh, Richard Greenberg. He's the guy you should call. I'll give you that number. He's in D.C. ... OK, Uh, 202-633-3368. I gave you one for Tom Doughty, FBI in D.C. (he spells out the name) 202-324-4532. I gave you CID. There's another guy in CID...Al Ristuccia [he looks in his book for the number] 688-4261. Mike [Flynn] also thinks that the Florida Attorney General is going to

bring some charges."

18. Armstrong continues with the names of other government contacts for "Joey", "Brackett Denniston...and he's 617-223-2280. He's Assistant U.S. Attorney [Boston] ... I'll tell you who wants to talk to you is CID. CID are the guys. That's the most likely, absolutely the most likely place in which the whole thing will happen."

19. As they prepare to leave, Armstrong sums it all up saying, "Shit, we have this group covered...divide it up structurally so that you have all the various key points which have to be covered. I think that you guys will be able to take over and then use operating income to continue the battle and that way you can secure the buildings. Take it over! That's going to pay off sooner or later."

20. What is his goal? What has this itinerant, unemployed Armstrong been thinking about this plan, and about his role in that plan? He tells "Joey", "I'm on the phone to the guy (Al Lipkin) real tight...they're the best the government's got to offer, you know, and if the government of the United States can't take on these little assholes down there, we're really in deep kaka." And he adds to "Joey", "We get together because I have a goal of global settlement." He has been hooked on visions of power and big money.

21. With my years of experience in working with, and in the company of, undercover agents and their accomplices, I find these Video-tapes positive evidence of the same routines and of the same

patterns of conspiracy that I have seen before. Here is a typical COINTELPRO situation, designed to infiltrate, degrade and to destroy a Church, just as similar plots had been made a few decades back. Here we have a pattern of government agencies working with a network of lawyers and their selected "Federal witnesses", in and out of the government, and coast to coast. They are involved in a plan to take over and to destroy a church in much the same way as COINTELPRO projects had functioned to compromise organizations in the past. They plan to begin with infiltration. They are setting up a recruitment project with "Joey" and his accomplices as their initial target. They have selected informers and their agents and are using the same tactics. They have hunted down former Church members and have employed and indoctrinated them to serve as Federal witnesses and as agents, to be trained to infiltrate the target organization.

22. Armstrong told "Joey" to create "cells" within the Church structure and then he, Armstrong, would have documents printed to appear just like regular Church documents, "During a part of this, we can simply create these. You know, I can create documents with relative ease... Well, we could set up a press, and could produce Issues (a type of Church document) and then we could set up a network." He plans to have these documents smuggled into the Church and concealed in its files, "All of a sudden those people (the cells) kind of rally together. So there is (sic) ways that stuff that's written can be used... and we could get communications lines running outside the organization."

23. Mr. Armstrong is far from naive and he has apparently been well rehearsed by his cohorts. He arrived at the meeting in the park with a large notebook that he used constantly for reference. As he outlined this carefully orchestrated, nationwide, multi-agency scheme, he sounded more and more like his mentors did in the hey-day of COINTELPRO. He mentions how, "You've got some things worked out in advance" and citing his IRS-CID accomplice Lipkin he says, "He's smart enough." He already talks about "SAFE HOUSES" and "RELOCATING" and "RE-NAMING PEOPLE." These are characteristically CIA and FBI terms. He has learned them from his government mentors.

24. Lest we misunderstand what we have been reading, these are not the extemporaneous plans of an average, unemployed individual. The proposed infra structure of this operation included:

- printing presses,
- smuggled documents,
- "cells" of infiltrators throughout a large and alert organization,
- "Safe Houses", and
- the costly and complex process of "relocation and re-naming people."

25. All of these things give evidence of a vast organization, of a magnitude of detailed planning and of special experience of an undercover, clandestine organization... all far beyond the capability of one individual, and of his expected recruit "Joey". Armstrong is a pawn in a massive organization designed for the purpose of

infiltrating, taking over and destroying the Church.

26. And, as if this was not enough, Armstrong adds to "Joey", "You find out all payments made that went from those attorneys, because I have people who can trace those bank accounts, and see where the disbursements went from those accounts. You follow me? And, whether or not there is the amount of money in the various client-trust accounts."

27. Following my own retirement from the military, I was employed as Vice President of a major bank in the District of Columbia. I am a graduate of the Graduate School of Banking at the University of Wisconsin. I know from first hand experience that the only people with the authority to "trace bank accounts" as Armstrong tells "Joey", are those with the FBI, and that they must have special and specific powers granted to them for that purpose.

28. We see in all this, and particularly in these revealing Video-taped sessions between the plotter, Armstrong and "Joey" the broad pattern of undercover conspiracy. This is the same technique, the same covert structure, the same probing mechanism we have known from the days of the FBI's COINTELPRO.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 19, 1985.

L. FLETCHER PROUTY